

**EPA/SMM New England Corporation Meeting Agenda**  
**June 16, 2015**

**I. INTRODUCTIONS**

**II. CONFIRMATION OF APPROPRIATE RECIPIENT**

[SMM New England Corporation]

**III. THE INDUSTRY - RIGHT SIZING OUR COMMENTS/PRESENTATION**

**IV. REPORTING REQUIREMENT**

**V. EPA'S GOALS, OBJECTIVES VIA TESTING ORDER**

**VI. TESTING ORDER**

**VII. NEXT STEPS**



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*Environmental solutions delivered uncommonly well*



# The Scrap Recycling Industry: Environmental Stewards

The U.S. scrap recycling industry, which employs 138,000 men and women, is also a pivotal player in **environmental protection, resource conservation, and sustainability.**

The scrap recycling industry recycled more than **135 million metric tons of materials in 2011**, thereby transforming society's outdated and obsolete products and materials into useful raw materials needed to produce new products. In doing so, the scrap recycling industry has made great savings in both energy and natural resources and thus has had an **extremely positive impact on our environment.** Further, by purchasing products at the end of their life and processing them back into raw materials used in the manufacture of new products, scrap recycling reduces the need for virgin materials, such as iron ore, trees, and other natural resources.

Scrap recycling offers **real sustainable solutions** for balancing economic growth and environmental stewardship. Scrap recycling stimulates economies from small towns in rural America to major cities to international trade. The result is **economic and environmental sustainability** for our nation and our world.

## Recycling Saves Energy

Recycling reduces greenhouse gas emissions by significantly **saving the amount of energy needed to manufacture the products** that we buy, build, and use. The energy saved by recycling can then be used for more important purposes, such as heating our homes and powering our automobiles. The scrap recycling industry takes the job of environmental steward extremely seriously.

Recycling	Saves the Energy Equivalent of:	Reduces Greenhouse Gas Emissions by (CO <sub>2</sub> Equivalent)
One Car	502 Gallons of Gasoline	8,811 lbs.
One Refrigerator	36 Gallons of Gasoline	566 lbs.
One Computer & CRT Monitor	27 Gallons of Gasoline	404 lbs.
One Washing Machine	24 Gallons of Gasoline	397 lbs.
Four Tires	18 Gallons of Gasoline	323 lbs.
One Television	8 Gallons of Gasoline	81 lbs.
10 lbs. of Aluminum Cans	7 Gallons of Gasoline	16 lbs.
10 lbs. of Cardboard	2 Gallons of Gasoline	40 lbs.

The total estimated **energy savings of 2 million tons** from scrap recycling globally is approximately 500 million tons per year.

Source: BIR, U.S. EPA Durable Goods Calculator, WARM Calculator  
<http://epa.gov/climatechange/wycd/waste/tools.html>

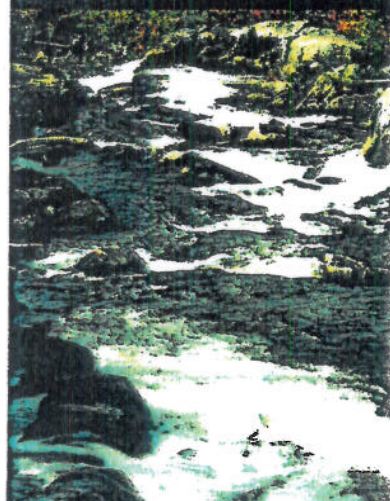


Recycling **reduces energy consumption** and the emission of greenhouse gases that contribute to global climate change, while **helping to maintain a steady supply of raw materials** for the U.S. and global economies.



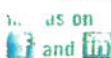
**ISRI**

Institute of  
Scrap Recycling  
Industries, Inc.



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Visit us at  
[www.isri.org](http://www.isri.org).



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Scrap Recycling  
Industries, Inc.,  
and follow us



**Recycling goes far, far beyond the bin** at the edge of the curb. In fact, in 2013 alone, more than 130 million metric tons of scrap metal, paper, plastic, glass, textiles, rubber, and electronics, valued at more than \$80 billion, were manufactured into specification grade commodities by the scrap recycling industry in the United States. These commodities were sold as valuable feedstock material to industrial consumers in the United States and in more than 160 countries around the world and contributed nearly \$24 billion in export sales, significantly helping the U.S. trade balance.

The U.S.-based scrap recycling industry is a sophisticated, capital-intensive industry that employs approximately 138,000 workers in the United States. As the first link in the manufacturing supply chain, scrap recycling has been integral to the U.S. economy, global trade, and resource sustainability for more than 200 years.



## U.S. Economy

	2010	2013
Industry Size	\$77 Billion	\$87 Billion
Employment (Yearly Average)	107,000	137,970
Volume of Scrap Material Annually Processed (Metric Tons)		
Iron and Steel	66,000,000	77,000,000
Paper	46,800,000	45,450,000
Aluminum	4,600,000	5,350,000
Copper	1,900,000	2,000,000
Lead	1,200,000	1,100,000
Inc	160,000	240,000
Plastic (bottles)	655,000 (2009)	515,000 (2012)
Electronics	3,500,000	4,000,000 (2011)
Tires (# of tires)	90,000,000	100,000,000 (2012)



## Environment

by requiring significantly less energy to manufacture products from recyclables than virgin materials and by avoiding landfilling.

92% for aluminum	90% for copper	98% for plastic
68% for paper	56% for steel	34% for glass

Recycling one ton of:

- Paper saves 3.3 cubic yards of landfill.
- Steel conserves 2,500 lbs. of iron ore, 1,400 lbs. of coal and 120 lbs. of limestone.
- Aluminum conserves more than 4 metric tons of bauxite ore

result from safely removing potentially hazardous materials and keeping them out of landfills:

- Mercury switches removed from older automobiles
- Lead recovered from computer monitors



## Global Trends

	2010	2013
Value of Scrap Commodities Exported Helping U.S. Trade Balances	\$29.6 Billion	\$23.7 Billion
Metric Tons of Scrap Exported Including:	45.3 Million	42.8 Million
Iron and Steel	18.7 Million	17.3 Million
Paper	18.9 Million	19.0 Million
Aluminum	1.9 Million	1.9 Million
Plastic	2.0 Million	1.9 Million
Nickel, Stainless and Alloy	1.9 Million	1.2 Million
Copper	1.0 Million	1.2 Million
Lead	44,000	35,000
Zinc	78,000	88,000
Rubber	172,000	83,000
Number of Countries Scrap was Exported to and Leading Destinations / Value	158 Countries	160 Countries
China	\$8.5 Billion	\$8.8 Billion
Canada	\$3.0 Billion	\$2.0 Billion
Turkey	\$1.5 Billion	\$1.9 Billion
South Korea	\$1.7 Billion	\$1.6 Billion
Taiwan	\$1.4 Billion	\$1.4 Billion
India	\$0.8 Billion	772,000,000
Mexico	\$1.0 Billion	840,000,000
Germany	\$0.7 Billion	\$1.2 Billion
United Kingdom	\$1.1 Billion	840,000,000
Italy	\$0.7 Billion	650,000,000
Japan	\$0.6 Billion	564,000,000
Hong Kong	\$0.6 Billion	428,000,000




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Visit us at [www.isri.org](http://www.isri.org), find us on [Facebook](#) and [Twitter](#) at Institute of Scrap Recycling Industries, Inc. and follow us on [LinkedIn](#) and [YouTube](#)



 <b>SIMS METAL MANAGEMENT</b>	<b>SAFETY, HEALTH, ENVIRONMENT &amp; COMMUNITY (SHEC)</b>	
	<b>ENVIRONMENTAL POLICY</b>	
	<b>Revision Date: 28 July 2010</b>	<b>Page 1 of 1</b>

## 1. OUR COMMITMENT

Sims Metal Management (SMM) is the leading metals and electronics recycling company in the world. As such, we actively support the protection of the environment and the role that the recycling industry plays in conserving resources. We are committed to conducting our business in a manner that protects the environment, supports the ecologically sound and sustainable use of resources and provide the minimization of waste and prevention of pollution.

We recognize this commitment as fundamental to our long term viability, prosperity and public responsibility and will continue to develop new recycling solutions, technologies and processes in support of this commitment. As a minimum, we will comply with all applicable environmental laws, regulations and standards of the countries and communities in which we operate, but will strive to achieve levels of performance which exceed basic compliance.

We will regularly monitor our environmental performance, objectives and targets and ensure that the support functions exist to effectively maintain and continually improve environmental standards. We will continue to promote individual commitment to safe and environmentally responsible behavior through the training and education of all employees.

## 2. OUR POLICY

**The Natural Environment:** In the conduct of our business and purchasing decisions, we will take into account potentially harmful impacts on the natural environment generally and on soil, water, air and biodiversity in particular, and ensure that prompt and appropriate action is taken to protect the environment and evaluate all operational activities for environmental risk and not commence such activities until adequate safeguards are in place.

**Industrial Processes:** We will strive to continuously improve our industrial processes so as to progressively reduce the amount of water and other natural resources which we consume, and the waste our activities generate.


**Energy and Carbon Emissions:** We will strive to minimize our carbon emissions through a progressive hierarchy of:

- The efficient use of energy;
- The use of renewable and cleaner forms of energy, where practicable and economically viable; and
- The use of verifiable and accredited offsets.

## 3. OUR SUPPORT

We are committed to supporting all of the above through effective leadership, communication, procedures, management systems, training and accountability at all levels, including a SHEC approval of all applicable capital expenditure requests and making employees and contractors aware of this policy, its impact on them and on the reputation of our business. We will maintain a system and culture of sharing best practices, and lessons learned with regard to SHEC matters with all facilities globally. This policy will be reviewed regularly in accordance with the Charter of the SHEC Committee of the SMM Board of Directors.



 <b>SIMS METAL MANAGEMENT</b>	<b>SAFETY, HEALTH, ENVIRONMENT &amp; COMMUNITY (SHEC)</b>	
	<b>ENERGY AND CARBON EMISSIONS POLICY</b>	
	<b>Revision Date: 28 July 2010</b>	<b>Page 1 of 1</b>

## 1. OUR COMMITMENT

Sims Metal Management (SMM) is committed to reducing our energy consumption by and the associated carbon profile of our day-to-day operations through the implementation of the following progressive hierarchy:

- The efficient use of energy;
- The use of renewable and cleaner forms of energy where practicable and economically viable; and
- The use of verifiable and accredited carbon off-sets.

By conserving energy, we can operate more cost effectively and reduce the carbon emissions impact of our activities on the environment. As a major recycler of ferrous, non-ferrous, electronics and other recyclable materials, we facilitate significant energy savings and carbon (CO<sub>2</sub>) reductions where these materials replace primary raw materials. However, energy is consumed during their collection, processing and transport to market, which in turn results in the emission of carbon (CO<sub>2</sub>).

We recognize the management of energy usage and reduction of carbon emissions as fundamental to our viability, prosperity and public responsibility. As a minimum, we will comply with all applicable local energy and carbon emissions laws, regulations and standards, including the monitoring and reporting rules of the countries in which we operate, but will strive to achieve levels of performance which exceed basic compliance.

## 2. OUR POLICY

We will strive to ensure that energy initiatives and carbon reduction opportunities are identified, pursued and communicated throughout our businesses. In particular, we will pursue an energy use and carbon reduction strategy that:

- Strives to employ production processes and transport activities that facilitate a commercially viable level of energy efficiency and associated carbon emissions profile;
- Progressively strives to reduce the use of non-renewable energy sources when commercially viable; and
- Progressively strives to increase the use of energy sources with a lower carbon emissions profile when commercially viable.


Management is specifically required to:

- Establish energy teams tasked with evaluating energy efficiency and carbon reduction in each geographic region;
- Undertake ongoing monitoring of energy and carbon emissions and publically report on a regular basis;
- Explore new ways to increase energy efficiency and reduce energy consumption and associated carbon emissions;
- Consider development of energy efficiency and carbon emissions control action plans relevant to the energy profile within their geographic region;
- Strive to ensure that energy efficiency and the nature of the energy source are key considerations when procuring new facilities and equipment;
- Give priority consideration to:
  - energy saving measures identified with a payback of 3 years or less, subject to normal capital expenditure request guidelines,
  - fuel/energy derived from sustainable sources, when commercially viable,
  - energy efficiency evaluations in all operational procedures; and
- Strive to ensure that all employees and contractors are aware of and are committed to this policy.

Active implementation of these energy and carbon emissions measures is the responsibility of all employees.

## 3. OUR SUPPORT

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 <b>SIMS METAL MANAGEMENT</b>	<b>SAFETY, HEALTH, ENVIRONMENT &amp; COMMUNITY (SHEC)</b>	
	<b>BIODIVERSITY POLICY</b>	
	Revision Date: 28 July 2010	Page 1 of 1

## 1. OUR COMMITMENT

Sims Metal Management (SMM) recognizes the importance of preservation of habitats and ecosystems to ensure biological diversity for future generations. As a recycler of ferrous, non-ferrous, electronics and other materials, we operate facilities globally in large urban and industrial areas. The very nature of our core business supports the global imperative of conserving materials and resources through recycling and re-use, thus contributing to the broader preservation of the environment and biodiversity.

We recognize the management of biodiversity as fundamental to our public responsibilities. As a minimum, we will comply with all applicable biodiversity laws, regulations and standards of the countries and communities in which we operate, but will strive to achieve levels of performance which exceed basic compliance.

## 2. OUR POLICY


We will strive to manage all our sites, operations and activities so as to:

- Ensure compliance with all biodiversity protection licensing conditions and regulations;
- Ensure the effective management and discharge of surface water to reduce impact on local ecosystems;
- Ensure that new facilities are planned, assessed and operated so that they meet the applicable governmental biodiversity requirements;
- Evaluate and report on biodiversity where applicable and relevant;
- Incorporate biodiversity into all relevant business decision making, including acquisition activities;
- Ensure that no operational activities are commenced without due consideration of their potential impact on biodiversity and appropriate mitigation measures employed; and
- Respect regional conservation strategies and work with local authorities regarding the protection of local areas wherever applicable.

## 3. OUR SUPPORT

We are committed to supporting all of the above through effective leadership, communication, procedures, management systems, training and accountability at all levels, including a SHEC approval of all applicable capital expenditure requests, and making employees and contractors aware of this policy, its impact on them and on the reputation of our business. We will maintain a system and culture of sharing best practices, and lessons learned with regard to SHEC matters with all facilities globally. This policy will be reviewed regularly in accordance with the Charter of the SHEC Committee of the SMM Board of Directors.



 <b>SIMS METAL MANAGEMENT</b>	<b>SAFETY, HEALTH, ENVIRONMENT &amp; COMMUNITY (SHEC)</b>	
	<b>SAFETY AND HEALTH POLICY</b>	
	<b>Revision Date: 28 July 2010</b>	<b>Page 1 of 1</b>

## 1. OUR COMMITMENT

We are committed to the safety of every individual and to providing a safe and healthy work environment for all of our employees, suppliers, contractors and visitors.

We recognize that the safety of our employees, suppliers, contractors and visitors comes before all other considerations and aim for a "zero harm" workplace. As a minimum, we will comply with all applicable occupational safety and health laws, regulations and standards in all of the jurisdictions in which we operate, but will strive to achieve levels of performance which exceed basic compliance.

## 2. OUR POLICY

**Safe Place and System of Work:** All injuries, illnesses and operational exposures associated with the workplace are preventable and can be safeguarded against. We will maintain sound general working conditions at all times through the provision of adequate, healthy and safe facilities and will provide appropriate support, including the use of external consultants as required, to ensure that the best safety and health practices exist in all our operations.

In support of this company policy

SMM facility managers: Are accountable for maintaining safe and healthy working conditions.

SMM's line managers and supervisors must:

- Ensure that a safe system of work exists and that risk assessments are implemented as required, when equipment is purchased or when jobs or processes significantly change;
- Ensure that employees are trained and supported in the safe performance of their assigned tasks.

Employees must:

- Refuse to perform any task that cannot be performed safely;
- Understand and comply with the letter and spirit of all safety and health policies, practices and procedures including the SMM Golden Rules;
- Promptly report any observed unsafe act or condition, safety incident or breach of safety and health policies and procedures to his/her supervisor;
- Support continuous improvement relating to safety and health; and
- Be accountable for his/her safe conduct at all times with regard to themselves, fellow employees and members of the community.

In the unfortunate event of a workplace incident, we will actively engage in the rehabilitation, injury management, support and return to work of injured employees.

**Continuous Improvement:** We will seek continuous improvement in all safety and health aspects of our operations and will seek to eliminate the risk of injury through the integration of safety and health evaluations for all operational activities, supported by appropriate risk management principles and tools.

Risk assessments will be carried out as required and will be an integral consideration when new businesses, plants and equipment are purchased or when jobs or processes significantly change.

**Consultation:** Our managers will regularly consult with employees and nominated or elected safety representatives or SHEC committee members on safety and health matters.

## 3. OUR SUPPORT

We are committed to supporting all of the above through effective leadership, communication, procedures, management systems, training and accountability at all levels, including a SHEC approval of all applicable capital expenditure requests and making employees and contractors aware of this policy, its impact on them and on the reputation of our business. We will maintain a system and culture of sharing best practices and lessons learned with regard to SHEC matters with all facilities globally. This policy will be reviewed regularly in accordance with the Charter of the SHEC Committee of the SMM Board of Directors.





SIMS  
METAL  
MANAGEMENT

# INTERNAL TICKET

FACILITY/YARD: WH

DATE: 5-9 TIME: \_\_\_\_\_ AM / PM

FROM: [REDACTED]

TO: \_\_\_\_\_

COMMODITY #: 1200 Desk / Racks

☐ REJECTION

☐ WARNING

☐ DOWNGRADE

☐ DEDUCTION

Wgt. Deduction: \_\_\_\_\_ (Regrade): \_\_\_\_\_

☐ Cylinders

☐ CFC's

☐ Dirt/Aggregate

☐ PCB's

☐ Paper/Wood/Trash

☐ Radioactives

☐ Tires

☐ Unshreddables

☐ Other

Silver Dodge Ram

Pile: \_\_\_\_\_ Location: 500

TR/TRLR #: \_\_\_\_\_ Trucker: \_\_\_\_\_

RR/CAR #: \_\_\_\_\_ BARGE #: \_\_\_\_\_

☐ Mobile Crusher Quantity: \_\_\_\_\_

Notes: 11C - 4416

253835166

Inspector's Signature

215451





**SIMS  
METAL  
MANAGEMENT**

## EXHIBIT A LIST OF PROHIBITED MATERIALS

Revision Date: December 21, 2009

Page 1 of 1

**Prohibited Materials:** The following materials are prohibited from acceptance at SMM Facilities, except as otherwise noted below:

- 1 Non-Recyclable Materials of any kind**, including asphalt, concrete, debris, dirt, rags, tires, trash<sup>1</sup>.
- 2 Free-flowing liquids** including hazardous (e.g., gasoline, motor oil, and other lubricants, hydraulic fluids, anti-freeze, oil paint, anti-freeze)<sup>2</sup> and non-hazardous materials (e.g. water)<sup>1</sup>
- 3 Flammable and Combustible Materials** or other petroleum products, including diesel fuel and gasoline<sup>2</sup>.
- 4 Corrosive Materials** such as lead acid batteries<sup>3</sup>
- 5 Radioactive Materials** of any type (e.g., military scrap, medical scrap, thickness measuring devices)
- 6 Explosive Materials** or potentially explosive materials of any type, such as munitions scrap (e.g., ammunition, shells).
- 7 Poisons, Infectious Materials or Chemicals** in solid, powder, liquid, or gaseous form (e.g., fertilizers).
- 8 Containers or Cylinders (Pressurized, Closed, or Formerly Containing Hazardous Materials)** (e.g. propane tanks, compressed gas tanks, aerosol cans, bulk storage tanks, fire extinguishers, storage tanks, process vessels).<sup>4</sup>
- 9 Materials or Containers Containing Hazardous Substance Residue**, including:
  - A** Asbestos-containing materials (ACM), such as pipe insulation or surfacing materials.
  - B** Aerosol cans that contained paint, water sealer, pesticides or other hazardous or toxic substances.
  - C** Non-aerosol containers that contained paint, water sealer, pesticides or other hazardous or toxic substances.
  - D** Air conditioning and refrigeration units containing CFCs, HCFCs or non-exempt refrigerant substitutes.
  - E** PCB-containing materials, such as capacitors, ballasts and transformers.
  - F** Lead-containing materials<sup>5</sup>
  - G** Mercury-containing materials (e.g. switches, fluorescent or mercury vapor lights/fixtures/bulbs, thermostats).
  - H** Cathode ray tubes (CRTs)<sup>1</sup> or Liquid crystal displays (LCDs)<sup>6</sup> or any device containing a CRT or LCD (e.g. computer monitor, laptop screen or television set.)<sup>1</sup>
- 10 Any Material Containing Hazardous or Toxic Substances or Wastes<sup>1</sup>.**
- 11 Automobiles** must have all fluids drained to the extent practicable or otherwise required by law, and their batteries, leaded battery cables, and mercury convenience light switches, and air bags, as required by law, removed<sup>2</sup>.

**[NOTE: See Back of Page for Spanish Translation]**

<sup>1</sup> Except to the extent that the Facility is authorized and has agreed to accept such materials.

<sup>2</sup> / Except to the extent that the Facility is authorized and has agreed to depollute applicable vehicles with respect to such materials.

<sup>3</sup> / Except to the extent that such batteries are accepted at designated Facilities and then only if not cracked, broken, burned, or with missing caps.

<sup>4</sup> / Except empty containers certified as "empty," per applicable law and approved in advance by Facility and otherwise properly prepared in accordance with SMM empty container requirements.

<sup>5</sup> / Except if accepted by the Facility as a specific commodity (e.g. lead acid batteries and leaded battery terminals, lead wheel weights, or electronic scrap materials such as CRTs or a device containing a CRT – such as a computer monitor or CRT television set.)

<sup>6</sup> / In certain states (e.g. California) LCDs and certain other recyclable electronic commodities are prohibited unless specifically accepted by the Facility at a designated receiving area.





## MATERIAL ACCEPTANCE POLICY

The following materials are prohibited from acceptance at Sims Metal Management (SMM) Facilities, except by special arrangement with SMM:

- 1) Non-Recyclable Materials of any kind including asphalt, concrete, debris, dirt, rebar, tires, trees.
- 2) Non-Hazardous Free-Flowing Liquids including water.
- 3) Hazardous Free-Flowing Liquids including gasoline, motor oil, hydraulic fluids, anti-freeze, oil paint, anti-freeze or other lubricants or petroleum products, except as contained in whole cars SMM purchased for vehicle disposition.
- 4) Flammable and Combustible Materials
- 5) Corrosive Materials such as acids and/or broken batteries. Whole batteries may be accepted for recycling.
- 6) Radioactive Materials of any type (e.g., military scrap, medical scrap, thickness measuring devices)
- 7) Explosive Materials or potentially explosive materials of any type, such as munitions scrap (e.g., ammunition, shells).
- 8) Chemicals or Poisons in solid, powder, liquid, or gaseous form (e.g., fertilizers).
- 9) Infectious Materials generally in red bags or marked by the infectious symbol.
- 10) Pressurized Containers or Cylinders including propane tanks, compressed gas tanks, aerosol cans, or extinguishers, except if the closed cylinder has been vented or if accepted under special arrangement.



11) Closed Containers including bulk storage tanks, process vessels, except if the containers are cut open and can be inspected to verify that they are empty.

12) Containers that Formerly Containing Hazardous Materials including drums, bulk storage tanks, process vessels, paint cans and/or aerosol cans except if the containers are certified as empty per applicable law, cut open and can be inspected to verify that they are empty.

13) Any Materials Containing CFCs, HCFCs or non-asympt refrigerant substances that have not be evacuated, except as contained in whole appliances SMM purchased for appliance disposition.

14) PCBs-containing materials (e.g., capacitors, ballasts and transformers) except if accepted under special arrangement.

15) Any quantity of Asbestos-containing materials (ACM), such as pipe insulation or surfacing materials.

16) Mercury-containing materials (e.g., switches, fluorescent or mercury vapor lights/bulbs, thermometers) except as contained in whole cars SMM purchased for vehicle disposition.

17) Cathode ray tubes (CRTs), liquid crystal displays (LCDs) or any device containing a CRT or LCD (e.g., computer monitor, laptop screen or television set, unless when accepted at an SMM electronics recycling facility).

### REQUIREMENTS FOR CERTAIN COMMODITIES ACCEPTED BY SIMS METAL MANAGEMENT

Processed Automobiles must have the following removed prior to delivery:

- 1) Fluids -
  - Oil (motor oil, transmission fluid, power steering and brake fluid from reservoirs)
  - Fuel
  - Coolant
  - Refrigerant
  - Any other fluids required by state/local law (e.g., washer fluid, auto fluid)
- 2) Batteries and leaded battery cable ends
- 3) Any mercury-containing devices, including convenience light switches and any other devices as required by law (lamps, backlit displays and AEB modules)
- 4) Air bag deployment initiators
- 5) No tires, dirt or trees.

### PREVENTING METAL THEFT

Sims Metal Management does not purchase stolen materials. If Company Personnel suspect material of being stolen, they may turn away the customer, and may notify local law enforcement.



Sims Metal Management follows all local and State regulations that apply to the purchase of metals to assist in the preventing the purchase of stolen metals. If you have specific questions about these local and State regulations, please contact your local SMM representative or SMM sales personnel.

1) SMM reserves the right to refuse any transaction it believes may be in violation of the law or that may contain stolen material.

2) All sales of metal must supply identification.

3) All transactions will be documented, and in some cases depending on the location, loads and certain materials will be photographed.

4) Please note that recyclers are often the victims of metal theft. SMM reserves the right to conduct video surveillance of our facilities and business operations.

### OUR COMMITMENT TO THE SAFETY, HEALTH, ENVIRONMENT AND THE COMMUNITY (SHEC)

In January of 2012, Sims Metal Management was recognized as one the World's Top 100 Most Sustainable Corporations at the 2012 World Economic Forum in Davos, Switzerland for the third year in a row - moving up 62 spots in the rankings to number 11.

Sims Metal Management has a strong commitment to the environment, sustainability and the health of the communities in which we do business. In all aspects of the business, Sims strives to implement best practices and fulfill the needs of our Safety, Health, Environment and Community (SHEC) Policy.

Sims Metal Management is committed to the community, supporting local education, schools, charity community and environmental organizations throughout the globe. We take seriously our efforts to be a good community and environmental partner. Everyday Sims Metal Management employees makes a positive impact on the environment.

In Fiscal 2011, Sims Metal Management's global carbon footprint was more than 300,000 metric tons, a reduction of 2% over Fiscal Year 2010. That compares to the 13 million metric tons of carbon emissions estimated as caused by Sims' recycling of steel alone (compared with the mining of ore and manufacture of new material for steel production)—a ratio of 1 to 42.





**SIMS  
METAL  
MANAGEMENT**

## SUPPLIER AGREEMENT

NEW ENGLAND REGION

Revision Date: June 2010

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### SCRAP ACCEPTANCE AGREEMENT

SELLER		RECEIVER	
Company Name:		SMM New England Corp.	
Person Signing:		242 Allens Avenue	
Title of Person		Providence, RI	
Address:		EFFECTIVE DATE	
City, State Zip			

This Scrap Acceptance Agreement ("Agreement") is entered into on the date above ("Effective Date") between the "Seller" indicated above and Sims Metal Management ("Receiver") under the following terms and conditions. The initial term of this Agreement shall commence upon the Effective Date and shall expire on three years after the Effective Date. Thereafter, the term of this agreement shall be automatically extended on a year-to-year basis, on the terms and conditions set forth in this Agreement.

1) **SEPARATE PURCHASE CONTRACT:** Receiver agrees to buy recyclable materials ("Materials") only upon each issuance to Seller of a Weighmaster Certificate or Purchase Contract for such Material and at the price specified therein, in accordance with the terms and conditions of both the front and reverse sides of that Purchase Contract.

2) **MATERIAL MUST MEET QUALITY REQUIREMENTS:** Receiver shall not be deemed to have accepted the Material purchased herein until such Material has been approved by Receiver at Receiver's facility. Receiver reserves the right to reject at any time, any Material not conforming with SMM quality requirements. Any Material which is rejected by Receiver shall be at Seller's sole cost and risk. Under no circumstances will title to any Material transfer to Receiver which is not as warranted, certified or conforming to this Agreement.

3) **SELLER SHALL EVACUATE REFRIGERANT FROM ALL MATERIALS PRIOR TO DELIVERY:** The federal Clean Air Act, 42 U.S.C. § 7401 *et seq.* (including section 608) and its implementing regulations at 40 CFR Part 82 (including section 82.156(g)-(h)), requires the removal and disposal of refrigerants and non-exempt refrigerant substitutes from motor vehicles and appliances prior to recycling. Seller certifies that all refrigerants (including without limitation chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs), or non-exempt refrigerant substitutes (and other non-CFC replacement refrigerants), and all other Class I and II substances, as defined in § 608 of the federal Clean Air Act, as amended, and in 40 Code of Federal Regulations Part 82) that have not leaked previously will be properly removed and recovered in accordance with all applicable laws from all appliances or shipments of appliances (including without limitation motor vehicle air conditioners) to be delivered under the Purchase Contract and this Agreement prior to the delivery of those appliances to Receiver. Seller shall not tender to Receiver any Materials subject to these requirements that have not been properly evacuated of refrigerant in accordance with law.

4) **SELLER SHALL INSPECT FOR HAZARDOUS MATERIAL PRIOR TO DELIVERY:** Seller shall inspect prior to delivery and shall not tender to Receiver any Materials which are considered hazardous or toxic materials, substances, or wastes under any applicable Law (as defined herein), including without limitation any of those Prohibited Materials described in Exhibit A, attached hereto and incorporated herein by reference ("Hazardous Material"). Seller certifies that the Material is exempt from regulation as a hazardous waste in accordance with all applicable federal, state, and local laws, regulations and requirements, and any guidance and interpretation by any applicable regulatory agency and any orders and decisions of any applicable court (each and all a "Law"). All warranties, certifications, indemnities, and other obligations made by Seller shall survive the expiration of this Agreement.

5) **INDEMNITY:** Seller agrees to defend, indemnify, release, and hold harmless Receiver and its owners, affiliates, and employees (each an "Indemnitee"), from and against any claim, penalty, fine, fee, cost, expense (including attorneys' and expert fees), loss, obligation, damages, enforcement actions, or any other liability of any kind sustained by any Indemnity arising directly or indirectly, in whole or in part, from any breach of this Agreement by Seller or any act or omission of Seller, its subcontractor(s), or any of their respective employees or agents.

The undersigned individual signing on behalf of Seller represents and certifies that he or she is duly authorized by the Seller to sign this agreement and certification on behalf of Seller. Any acknowledgment or confirmation issued by Seller regarding any Contract or this Agreement shall be deemed as issued solely for administrative purposes but in no event shall any terms or conditions thereon govern.

**AGREED: SELLER**

**AGREED: RECEIVER/SIMS METAL MGMT**

Signature: \_\_\_\_\_

Signature: \_\_\_\_\_





SIMS  
METAL  
MANAGEMENT

# PROHIBITED MATERIALS

## (MATERIALES PROHIBIDOS)

### NON-METALLICS NO-METALICOS

- TIRES
- DIRT
- WOOD
- ASBESTOS
- INSULATION
- FIBERGLASS
- ROOFING
- SOLID WASTE



### CORROSIVES CORRISIVOS

- BATTERIES



### RADIOACTIVE MATERIALES RADIOACTIVOS



### COMPRESSED GAS CYLINDERS CILINDROS DE GAS COMPRIMIDO



### HAZARDOUS LIQUIDS LÍQUIDOS PELIGROSOS

- ANTIFREEZE
- OIL
- PAINT



### EXPLOSIVES EXPLOSIVOS

- FIREARMS
- AMMUNITION
- SHELLS



### FLAMMABLE MATERIALS MATERIALES INFLAMABLES



### PCBs

- CAPACITORS
- TRANSFORMERS
- BALLAST



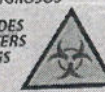
### CFC/FREON FREÓN

- AIR CONDITIONERS
- COMPRESSORS
- CARS



### OTHER HAZARDOUS MATERIALS OTROS MATERIALES PELIGROSOS

- PESTICIDES
- OIL FILTERS
- AIR BAGS
- LEAD
- CRTs
- MERCURY SWITCHES
- FLUORESCENT LIGHTS



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